

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR
STRUCTURING FINANCIAL TRANSACTIONS
TO EVADE RECORDING REQUIREMENTS**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
ASIF GAFUR	*	VIOLATION: 31 U.S.C. §5324(a)(3)

* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **ASIF GAFUR**, was a book-keeper.
2. The defendant, **ASIF GAFUR**, served as the bookkeeper for Jon Johnson and Jon

Johnson's campaign for Louisiana State Senate in 2007.

3. Ninth Ward Housing Development Corporation ("Ninth Ward") was a non-profit organization with which Jon Johnson was affiliated.

4. In and around early September 2007, Jon Johnson solicited campaign contributions from **ASIF GAFUR**. **GAFUR** told Johnson that he did not have money to make a campaign contribution to Jon Johnson's campaign.

5. Shortly after the meeting in and around early September 2007, Jon Johnson personally handed an \$8,000.00 check to **ASIF GAFUR** drawn on Ninth Ward's checking account at Dryades Savings Bank ("DSB 655"). The check was made out to **ASIF GAFUR**. The check was signed by the brother of Jon Johnson and another person known to the United States Attorney.

6. Upon being handed the \$8000.00 check by Jon Johnson, **ASIF GAFUR** was directed by Jon Johnson to ensure that the money was contributed to Jon Johnson's campaign.

7. On or about September 10, 2007 **ASIF GAFUR** cashed the \$8,000.00 check he had been given by Johnson at Dryades Savings Bank.

9. The defendant, **ASIF GAFUR** understood that pursuant to the rules and regulations of the State of Louisiana, it was not permissible to make a single contribution of \$8000.00 to Jon Johnson's campaign account.

10. The defendant, **ASIF GAFUR** had various clients who owned multiple businesses.

11. The defendant, **ASIF GAFUR**, used money orders in the names of three (3) clients, four (4) of their businesses, and himself, to make it appear that nine (9) separate

campaign contributions were being made to Jon Johnson.

12 The United States Postal Service was a financial institution, as that term is defined by Title 31, United States Code, Section 5312(a)(2)(V) and 31 Code of Federal Regulations 1010.100, FF.

13 Title 31, United States Code, Section 5325 prohibited a financial institution from issuing a money order or a series of money orders in an amount greater than \$3,000.00 without first obtaining and recording proper identification from the person seeking to purchase the money order.

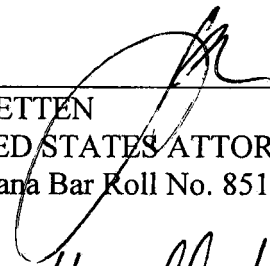
B. THE STRUCTURING OFFENSE

On or about September 10, 2007, in the Eastern District of Louisiana, the defendant, **ASIF GAFUR**, having cashed the \$8,000.00 as described above, did knowingly and for the purpose of evading the reporting requirements of section 5325 of Title 31, United States Code, and the regulations promulgated thereunder, structure the following transactions with the United States Postal Service, a domestic financial institution, by using the \$8,000.00 to purchase nine (9) United States Postal Service money orders, made payable to Jon Johnson's State Senate Campaign, in separate transactions or series of transactions, of less than \$3,000.00:

<u>From</u>	<u>Amount</u>	<u>Post Office</u>	<u>Check #</u>
Business A	\$1,000.00	70119	11241217697
Business D	\$950.00	70119	11241217708
Business B	\$420.00	70119	11241219958
Client 3	\$900.00	70119	11241217710
Client 1	\$900.00	70118	11238066426

Client 2	\$900.00	70118	11238066437
Client 1	\$1,000.00	70118	11238066415
ASIF GAFUR	\$900.00	70113	11604438718
Business C	\$1,000.00	70113	11604438707

All in violation of Title 31, United States Code, Section 5324(a)(3).



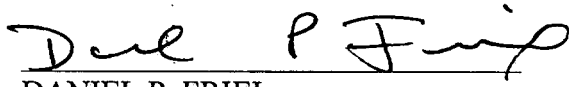
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